

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**CHRISTOPHER FERGUSON,
individually and on behalf of others
similarly situated,**

23

Plaintiffs,

188

V.

CIVIL ACTION NO. 6:17-CV-00111-DTG

TEXAS FARM BUREAU BUSINESS CORPORATION, TEXAS FARM BUREAU CASUALTY INSURANCE COMPANY, TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY, TEXAS FARM BUREAU UNDERWRITERS, FARM BUREAU COUNTY MUTUAL INSURANCE COMPANY OF TEXAS, SOUTHERN FARM BUREAU LIFE INSURANCE COMPANY, and TEXAS FARM BUREAU,

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Defendants.

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JOINT PRE-TRIAL ORDER

Plaintiff Christopher Ferguson and opt-in Plaintiffs Daryl Blackwell, Ricky Martin, Lloyd McCord, Brandon Wheeler, David Henry, Mike Cook, Brandon Peek, Darrell Beakley, Gary Clements, Connie Lovelady, and Matthew Stanton (“Plaintiffs”) and Defendants Texas Farm Bureau, Texas Farm Bureau Business Corporation, Texas Farm Bureau Casualty Insurance Company, Texas Farm Bureau Mutual Insurance Company, Texas Farm Bureau Underwriters, and Farm Bureau County Mutual Insurance Company of Texas (“Texas Farm Bureau”) and Southern Farm Bureau Life Insurance Company (“SFB Life”) (collectively, “Defendants”) submit this Joint Pretrial Order in compliance with the Seventh Amended Scheduling Order, the Local Rules of the

United States District Court for the Western District of Texas, and the Amended Standing Order on Pre-Trial Procedures and Requirements in Civil Cases of the Western District of Texas, Waco Division.

The following documents are attached hereto:

Tab No.	Description
1	Joint Pretrial Order
A	Appearance of Counsel
B	Joint Statement of the Case
C	Contentions of the Parties
D	Plaintiffs' Trial Exhibit List
E	Defendants' First Amended Trial Exhibit List
F	Plaintiffs' First Amended Witness List
G	Defendants' Joint Second Amended Witness List
H	Joint Requested Jury Instructions and Verdict Form With Annotations
I	Charge and Interrogatories
J	Joint Proposed Juror Questionnaire
K	Defendants' Contentions Regarding Disputed Issues of Law
L	Plaintiff's Motion in Limine and Memo in Support
M	Defendants' Omnibus Motion in Limine

The Parties anticipate the trial will last for approximately three weeks.

Dated: August 5, 2024.

Respectfully submitted,

By: /s/ Avi Moshenberg (with permission)

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CERTIFICATE OF SERVICE

I certify that on August 5, 2024, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will serve a copy on all counsel of record.

/s/ Barry A. Moscowitz
Barry A. Moscowitz